

1 **DECLARATION OF SIMON ARON**

2 I, Simon Aron, declare as follows:

3 1. I am an attorney duly admitted to practice before this Court. I am Of
4 Counsel to the law firm of Wolf, Rifkin, Shapiro, Schulman & Rabkin LLP, attorneys of
5 record for Creditor Wolf Family Series LP D/B/A Series III, Wolf Family Series LP
6 D/B/A Series VII; Ontario Enterprises Of The Wolf Family Series LP ("Wolf"). I have
7 personal knowledge of the facts set forth herein, except as to those stated on information
8 and belief and, as to those, I am informed and believe them to be true. If called as a
9 witness, I could and would competently testify to the matters stated herein.

10 2. On January 17, 2019, I provided the attached written notice to counsel for
11 Kmart Corporation, the debtor and debtor in possession herein, a true and correct copy of
12 which is attached hereto as Exhibit "A". Other than threatening Wolf with a willful
13 violation of the automatic stay, no response was received to Exhibit "A".

14 3. From and after January 2, 2019, I sent 24 emails to counsel for the Debtor
15 advising them of repeated problems at the property and requesting an inspection of the
16 interior of the premises. Many of these email included pictures, many of which are
17 attached to the Declaration of Rosalie Rubaum, the manager of Wolf, filed concurrently
18 herewith.

19 4. No response was received from counsel addressing any of the problems at
20 the property or agreeing to a full inspection of the interior of the premises by Wolf.

21 I declare under penalty of perjury under the laws of the United States of America
22 that the foregoing is true and correct.

23 Executed May 1, 2019, at Los Angeles, California.

24
25 /S/Simon Aron
26 **SIMON ARON**
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